

The Honorable Mary Alice Theiler

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff
v.
WAYLAN GRAVES,
Defendant.

| NO. CR23-5287

GOVERNMENT'S RESPONSE TO DEFENDANT'S MOTION TO REOPEN DETENTION

On October 24, 2023, Defendant, Waylan Graves, filed a motion to reopen the issue of detention. Dkt. 14. The Government does not oppose the reopening of detention, however, the Government opposes the release of Mr. Graves as he presents a risk of flight, and a danger to the community and there are no conditions, or combination of conditions that would reasonable assure future Court appearances and address the safety of the community.

Mr. Graves was indicted on October 11, 2023 for two counts of Possession of Controlled Substances with Intent to Distribute, and two counts of Carrying a Firearm During and in Relation to a Drug Trafficking Crime. Dkt. 1. Mr. Graves made his initial appearance on October 12, 2023, and pleaded not guilty. Dkt. 10. At Mr. Graves' initial

1 appearance he stipulated to detention without prejudice. *Id.* Trial was set for December 1,
2 2023. *Id.*

3 As Mr. Graves stipulated to detention at his initial appearance, the Government
4 does not oppose reopening detention. However, the Government will argue at the
5 detention hearing that Mr. Graves presents a risk of flight and a danger to the community
6 and there are no conditions, or combination of conditions that would reasonably assure
7 future Court appearances and address the safety of the community.

8 DATED this 26th day of October, 2023.

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10 Respectfully submitted,

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